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November 1, 2002

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Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: WC Docket No. 02-314  
Qwest Communications International Inc.'s Consolidated  
Application for Authority to Provide In-Region,  
InterLATA Services in Colorado, Idaho, Iowa, Montana,  
Nebraska, North Dakota, Utah, Washington and Wyoming**

Dear Ms. Dortch:

Submitted herewith on behalf of Qwest Communications International Inc. are clarifications to certain materials included in Qwest's Reply Comments filed on October 25, 2002.

1. Correction of page numbers in the Reply Declaration of Lynn M V Notarianni & Christie L. Doherty, Checklist Item 2 of Section 271(c)(2)(B), Operations Support Systems.

This Declaration's Table of Contents contained mislabeled subsections in section I(E). Please substitute this corrected first page of the Table of Contents, and the four corrected pages (15, 20, **24**, **34**) in which those subsection headings appeared. Confidential and redacted versions of page **24** are included in this filing.

2. Correction of footnote 72 of the Reply Declaration of Michael G. Williams, Commercial Performance.

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Ms. Marlene H. Dortch  
November 1, 2002  
Page 2

This Declaration contained a footnote that referred to an *ex parte* as "08/18/02b." The *ex parte* referred to in this footnote actually was filed on August 19, 2002, and should have been referred to as "8/19/02b." Please substitute this corrected page containing an appropriately labeled footnote 72.

Kindly address any questions in connection with this submission to the undersigned.

Respectfully submitted,

Hogan & Hartson L.L.P.

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**ATTACHMENT 1**

**Revised Pages for Inclusion in the  
Notarianni & Doherty Checklist Item 2 OSS Reply Declaration**

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Field Names	UNE Remand Order Requirements	IMA Loop Qualification Tool**	IMA Raw Loop Data Tool and Wire Center Batch Raw Loop Data Tool
Wire Center Name (CLLI code)		X	X

### **Legend**

\*\* = Data returned via Loop Qual Tab & Loop Data Tab. Based on LSOG 5

X = Present/Available

D = Determinable by Other Data Provided

20. Despite this compelling evidence that \$west's loop qualification tools meet every FCC test and standard, AT&T and Covad continue to complain. Most of the arguments raised by AT&T and Covad are mere restatements of their comments in \$west's earlier 271 filings. Nevertheless, Qwest will address those issues again here.

### **2. Covad's General Concerns**

21. As stated in the Qwest I and Qwest II Reply Declarations, Covad has acknowledged that it has never stated in any testimony or brief that the categories of information provided by the Raw Loop Data Tool are insufficient for

ADSL portion of the Loop Qualification Tool. This tool provides a “Yes” or “No” qualification response that indicates whether the loop meets ADSL standards, calculates insertion loss for the CLEC, and provides loop make-up information in a format consistent with LSOG 5 guidelines.

27. Qwest has now had an opportunity to probe behind Covads long-standing assertions that the Raw Loop Data Tool is inadequate. These allegations simply do not hold water. As final evidence that Covad's claims are overstated, even though Qwest has offered a manual loop qualification process for several months in the event a CLEC believes that the data in either the Raw Loop Data Tool or the Loop Qualification Tool is incomplete, inconsistent, or if the CLEC questions the accuracy of that make-up information, Covad has not requested a single manual loop qualification.

### 3. Direct Access to LFACS

28. AT&T contends that because Qwest does not provide CLECs with direct access to its LFACS database, it does not provide the same loop qualification information that is available to Qwest.<sup>43</sup> This is the same claim AT&T made – and to which Qwest responded – in both the Qwest I and Qwest II proceedings.<sup>44</sup> The only difference now is that AT&T makes a few additional allegations to support its claim. But, as explained more fully below, these new

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<sup>43</sup> See AT&T Comments and Finnegan/Connolly/Wilson Decl. at ¶ 22.

<sup>44</sup> See generally Qwest I OSS Reply Decl. at §II.A; Qwest II OSS Reply Decl. at §II.A.

\*\*\*CONFIDENTIAL MATERIAL ENDS HERE\*\*\*] Furthermore, like Covad, AT&T has not availed itself of the manual process Qwest established several months ago. Thus, AT&T does not have competitive standing to demand more of Qwest.

33. CLECs have raised claims for direct access to LFACS in the Colorado 271 proceeding, the Washington 271 proceeding, and the Multi-State proceedings. All of the commissions in the states included in this application found that direct access was not necessary, and that the mediated access Qwest provides is adequate.<sup>46</sup>

4. **Comments Regarding Pre-order Mechanized Loop Tests Versus Post-order Provisioning Mechanized Loop Tests**

34. AT&T and Covad again argue that Qwest does not meet its obligations under the Act because it has not created the functionality for CLECs to perform a mechanized loop test (“MLT) on a pre-order basis.<sup>47</sup> These CLECs raised this issue and their arguments in the state proceedings, and the state commissions in each of the Application states denied their demand. Thus, the state commissions have evaluated this issue already.<sup>48</sup> Qwest also previously addressed

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<sup>46</sup> Qwest I OSS Reply Decl. at ¶ 56, n.63; Qwest II OSS Reply Decl. at ¶ 62, n.77.

<sup>47</sup> AT&T Finnegan/Connolly/ Wilson Decl. at ¶ 21; Covad Comments at 2.

<sup>48</sup> See *Washington Commission 20<sup>th</sup> Supplemental Order Addressing Checklist Item No. 4, Emerging Services, General Terms and Conditions, Public Interest; Track A, and Section 272* at ¶ 74; *Colorado Hearing Commissioner Order on*

retained does not include such loop qualification information as the presence or location of bridge taps and load coils – the information retained relates almost exclusively to whether trouble was found and cleared on the loop.<sup>67</sup>

50. It bears noting that the MLT information at issue would be of no use to CLECs for loop qualification purposes because it exists only for loops that CLECs have already ordered, and not for Qwest retail loops. Please see the Declaration of Mary Pat Cheshier for a more detailed description regarding this issue.

## **5. Summary**

51. Qwest meets the requirements of Section 271 by providing significant functionality to CLECs so that they can determine whether a loop qualifies for xDSL services. In addition, Qwest has implemented a manual process to permit CLECs to obtain loop make-up information manually in the unlikely event that the Raw Loop Data or Loop Qualification Tools provide incomplete or unclear make-up information for a particular address or telephone number or if the CLEC believes that the returned loop information may be inaccurate.<sup>68</sup>

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<sup>67</sup> Limited loop length information is sometimes retained, but as described below, MLT loop length is not as reliable as other loop length information, and to the extent it is the best information available, MLT loop length information is already loaded by Qwest into the Loop Qualification Database via the MALTs process.

<sup>68</sup> See Qwest I OSS Reply Decl. at ¶¶ 69-71; Qwest II OSS Reply Decl. at ¶¶ 42, 55, 82, 84-85.



**ATTACHMENT 2**

**Revised Page for Inclusion in the  
Williams Performance Reply Declaration**

results show.<sup>70/</sup> The cause was related to retail orders where Qwest's service representatives offered shorter-than-standard intervals against process guidelines. An edit in the Service Order Processor was put in place to prevent this from reoccurring.

53. Finally, with respect to OP-4B (Installation Interval for Dispatch Outside MSAs) for Wyoming Resale Centrex, where Qwest missed two out of four months, there were a total of only seven Centrex orders in July 2002, of which three were retail and four were wholesale.<sup>71/</sup> In August 2002, there were five retail and seven wholesale orders. In these specific cases, the wholesale orders involved due dates based on 5-day intervals. As a matter of load rebalancing, intervals can be made shorter if the customer agrees. Some of the retail orders had shorter intervals on this basis, whereas the wholesale orders, while eligible on the same basis for shorter intervals, had planned their assigned intervals and did not want to change to shorter intervals. This kind of factor is not detectable by the measurement process and is not excluded, per the PID. The effect of the shorter intervals on the retail side, versus the original intervals retained by the CLECs on the wholesale side, resulted in the observed differences.<sup>72/</sup>

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<sup>70/</sup> See, e.g., Qwest III Brief, Att. 5, App. D, Colorado Commercial Performance Results at 122-25.

<sup>71/</sup> *Id.*, Wyoming Performance Results at 246.

<sup>72/</sup> Qwest has already explained its performance results with respect to OP-3 Installation Commitments Met for EELs. See Qwest I & II *ex parte* 08/19/02b at 3-5.